

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 07 CR 799
v.	)	
	)	Judge Ronald A. Guzman
JU WEN ZHOU, et al.,	)	
	)	
Defendants.	)	

**MOTION FOR EXTENSION OF TIME**

Susan Chen, through her attorneys, moves this Court for an extension of time within which to file her pre-trial motions and in support thereof states as follows:

1. The United States charged Susan Chen with conspiring to violate 21 U.S.C § 841(a)(1), 21 U.S.C. § 846, 18 U.S.C. § 2, 21 U.S.C. §§ 952(a) and 960. Ms. Chen has entered a plea of not guilty.
2. The Court previously ordered Ms. Chen to submit her pre-trial motions by Friday, April 18, 2008.
3. Counsel for Ms. Chen and the United States expect to resolve this matter short of trial. In addition, the United States has continuously provided voluminous discovery since January 25, 2008 until its most recent production on March 21, 2008.
4. In order to conserve judicial resources and avoid the unnecessary expense associated with pre-trial motions, Ms. Chen requests an extension of time of 60 days (until June 18, 2008) to file her pre-trial motions, if necessary.

5. Counsel for Ms. Chen has spoken with the Assistant United States Attorney, Timothy Chapman, who indicated that the United States has no objection to the requested extension of time.

6. This is Ms. Chen's first request for an extension of time.

Respectfully submitted,

SUSAN CHEN

By: s/ John J. Scharkey  
One of Her Attorneys

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